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Assembly California Legislature



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NATURAL RESOURCES
LOCAL EMERGENCY PREPAREDNESS
RAIL
WASTE REDUCTION AND RECYCLING IN THE
21ST CENTURY CALIFORNIA

April 6, 2015

The Honorable Edmund G. Brown, Jr.
Governor, State of California
State Capitol, 1st Floor
Sacramento, CA 95814

RE: DOGGR Review of Active UIC Program

Dear Governor Brown:

We are writing to thank you and your staff, at the Division of Oil, Gas, and Geothermal Resources' (DOGGR), for working in coordination with the State Water Resources Control Board (SWRCB) and the United States Environmental Protection Agency (USEPA) in your efforts to systematically review thousands of produced water re-injection and enhanced oil recovery wells to ensure and protect the safety of our potable drinking water.

We reviewed the California Environmental Protection Agency (CalEPA) memo - *Review of the Underground Injection Control (UIC) Program*, dated March 20, 2015, where it states that approximately 2,500 injection wells have been identified and after sample testing of several wells, no contamination from oil production wastewater has been detected. We cannot stress enough the importance of these findings and know that DOGGR takes these efforts seriously and has committed to a second review of all new or expanded project permit applications to ensure environmental and public safety.

We concur and believe prompt review of these wells is of paramount importance and further encourage the administration to direct the SWRCB and DOGGR to review the productive boundary/aquifer exemption applications that have been submitted as expeditiously as possible.

As you know, the USEPA will require the state to shut-in 140 injection wells as soon as October 15th of this year if these applications are not fully approved by that date, even if the injection is shown to pose no threat to the environment. We strongly urge your administration to take the necessary steps to ensure that these applications are processed before the October 15th deadline.



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Now that the USEPA has accepted the state's work plan we strongly encourage DOGGR and the SWRCB to dedicate the needed personnel and prioritize and complete the processing of the applications to the USEPA for aquifer exemptions. The USEPA cannot act until the State completes its work first.

As you are aware, the assertion that "high-quality aquifers" are being placed at risk is not at all consistent with the information DOGGR has posted online at the direction of your office. DOGGR is taking the necessary steps and adhering to the strictest scientific standards to ensure the safety of our water and should be allowed to continue in this endeavor, basing decisions off accurate science not conjecture.

Thank you in advance for your consideration of our views and the leadership your office has shown. We stand ready to work with you and your office to ensuring the SWRCB and DOGGR complete their reviews as promptly as possible.

Sincerely,



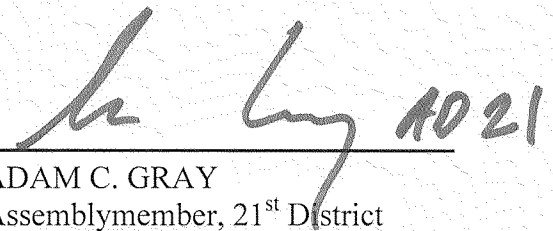
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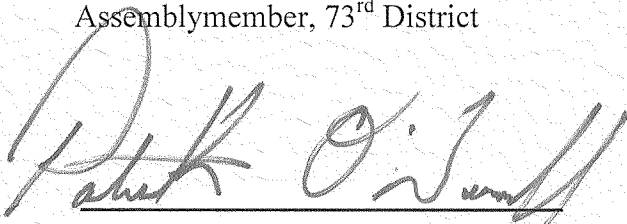
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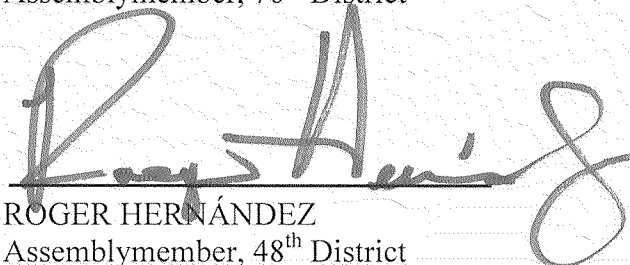
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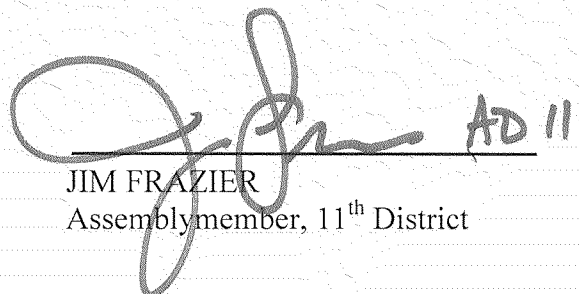
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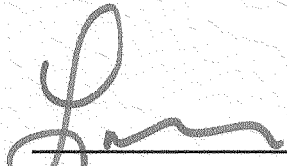
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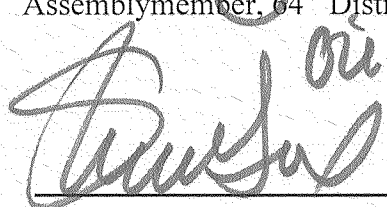
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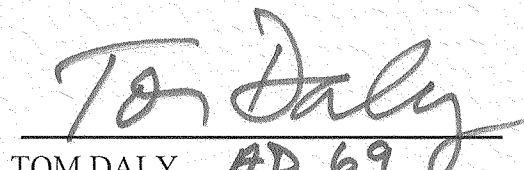

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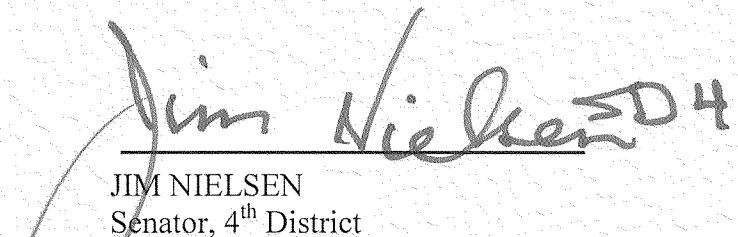

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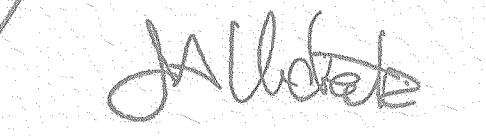

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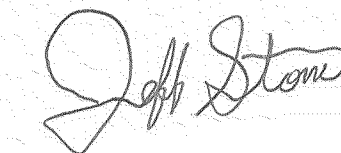

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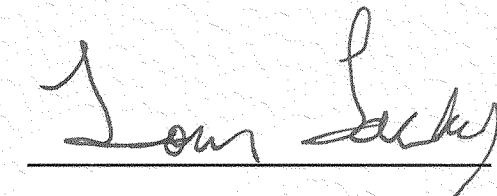

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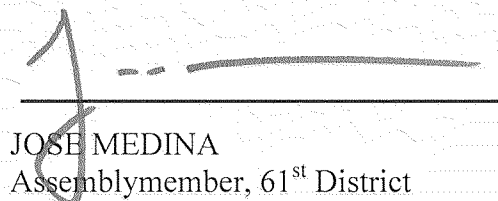

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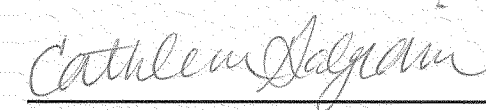

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